



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

February 21, 2019

VIA ECF

Hon. Kenneth M. Karas  
United States District Judge  
United States District Court  
300 Quarropas Street  
White Plains, NY 10601-4150

MEMO ENDORSED

Re: *Markota, et al. v. Nielsen, et al.*, No. 18 Civ. 11081 (KMK)

Dear Judge Karas:

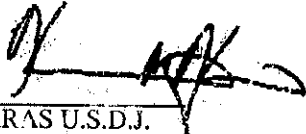
On behalf of the government, I write respectfully to request an extension of time of 30 days—from February 25, 2019 to March 27, 2019—to respond to the complaint in the above-referenced matter. This is the government's first request for an extension of time, and the plaintiffs' lawyer consents.

This is a mandamus action in which plaintiffs seek an order compelling the adjudication of plaintiff Jack Buckby's ("Buckby") visa application. Buckby applied for a B tourist visa in March 2017 and was refused under the Immigration and Nationality Act ("INA") section 221(g). Buckby applied for an I journalist visa in November 2018 and was also refused under INA section 221(g). On November 29, 2018, plaintiffs filed this lawsuit; the government's response is due on February 25, 2019. Nonetheless, as of this date, I have been informed by the Department of State that the consular officer expects to further adjudicate these visa applications in the next two weeks. As a result, the government anticipates that the requested extension will provide adequate time for the relief sought in this complaint, *i.e.*, adjudication of Buckby's visa application.

I thank the Court for its consideration of this request.

Granted. 2/22/2019

SO ORDERED

  
KENNETH M. KARAS U.S.D.J.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney  
Southern District of New York

By: s/ JOSHUA E. KAHANE  
JOSHUA E. KAHANE  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, New York 10007  
Telephone: (212) 637-2699  
E-mail: joshua.kahane@usdoj.gov

cc: Nicklaus Misiti, Esq. (via ECF)